

**REQUIRED STATEMENT TO ACCOMPANY  
ALL MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Ramon M. Santiago Case No. 20 B 16936 Chapter 13

All Cases: Moving Creditor Village Station Homeowner's Area Association, Inc. Date Case Filed 9/11/2020

Nature of Relief Sought: ☒ Lift Stay    Annul Stay    Other (describe) \_\_\_\_\_

Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed January 29, 2021

Chapter 7:        No-Asset Report Filed on \_\_\_\_\_  
                     No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

1. Collateral

- a. ☒ Home 1635 Station Park Drive, Grayslake, Illinois
- b. Car Year, Make and Model \_\_\_\_\_
- c. Other (describe) \_\_\_\_\_

2. Balance Owed as of Petition Date \$2,052.20 Includes Fees and Costs. \_\_\_\_\_  
Total of all other Liens against Collateral \$190,470.00 Per Debtor(s) Schedule D. \_\_\_\_\_

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$185,000.00 Per Debtor(s) Schedule A

5. Default

- a. ☒ Pre-Petition Default  
Number of months 4+ Amount \$ 2,052.20
- b. ☒ Post-Petition Default
  - i. ☒ On direct payments to the moving creditor  
Number of months 5+ Amount \$ 2,827.38
  - ii. On payments to the Standing Chapter 13 Trustee  
Number of months \_\_\_\_\_ Amount \$ \_\_\_\_\_

6. Other Allegations

- a. Lack of Adequate Protection § 362(d)(1)
  - i. No insurance
  - ii. Taxes unpaid Amount \$ \_\_\_\_\_
  - iii. Rapidly depreciating asset
  - iv. ☒ Other (describe) Failure to pay association assessments, fees, and costs
- b. ☒ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
- c. Other "Cause" § 362(d)(1)
  - i. Bad Faith \_\_\_\_\_
  - ii. Multiple filings \_\_\_\_\_
  - iii. Other (describe) \_\_\_\_\_
- d. Debtor's Statement of Intention regarding the collateral
  - i. Reaffirm    ii. Redeem    iii. Surrender    iv. No Statement of Intention Filed

Date: September 7, 2021

/s/ Ronald J. Kapustka  
Counsel for Movant

(Rev. 12/21/09)

NOTE: Pursuant to the Fair Debt Collection Practices Act you are advised that this law firm is deemed to be a debt collector attempting to collect a debt and any information obtained will be used for that purpose.